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March 2, 2022

VIA ECF

Hon. Gabriel W. Gorenstein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**MEMORANDUM ENDORSED**

Re: Medcenter Holdings Inc. et al. v. WebMD Health Corp. et al.,  
No. 20-civ-00053 (ALC) (GWG) – Hague Convention Letter of Request

Dear Judge Gorenstein:

We are counsel for plaintiffs Medcenter Holdings Inc. and its several Latin American affiliates (collectively, “Medcenter”). We submit this letter to respectfully request the Court’s issuance of the enclosed Letter of Request with Attachments pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters (the “Letter”). Defendants’ counsel has consented to issuance of the Letter in the interest of having the parties avoid unnecessary motion practice and expediting the Hague Convention process.

The Letter seeks to present questions to a non-party witness residing in Buenos Aires, Argentina, Ms. Estefania Aristu. Ms. Aristu was a former employee of Medcenter in Latin America who left to work for one or more of the defendants in April 2016. She is a material fact witness who was so identified by both parties in their respective initial disclosures and interrogatory responses. The factual grounds supporting issuance of the Letter are set forth in Attachment B to the Letter.

We are also advised by our local Argentine counsel that the Argentine judicial authority designated under the Convention prefers an original signature of the Court and a seal of the Court to be affixed to the Letter, as provided for on the last page of the Letter itself.

The parties are of course amenable to any additional procedure the Court may require in connection with issuance of the Letter.

Respectfully submitted,



Barry Werbin

Application granted. Please mail or deliver an original of the Letter to the Courthouse, to the attention of the undersigned. If you have not been contacted with instructions on picking up the signed and sealed original within 7 days, please call Chambers to inquire.

So Ordered.

  
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GABRIEL W. CORENSTEIN  
United States Magistrate Judge

March 3, 2022